IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

JANE ROE,)
Plaintiff,) C.A. No. 18-1525-RGA
v.) C.A. No. 16-1323-ROA
WYNDHAM WORLDWIDE, INC.;)
WYNDHAM HOTEL GROUP LLC;)
WYNDHAM HOTEL MANAGEMENT, INC.)
WYNDHAM HOTELS AND RESORTS, LLC)
WYNDHAM HOTEL GROUP (UK) LIMITED;)
WYNDHAM GRAND ISTANBUL LEVENT; and)
ÖZDILEK HOTEL TOURISM AND TRADE)
LIMITED COMPANY,)
)
Defendants.)

STIPULATION & [PROPOSED] ORDER FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties, subject to the approval of the Court, that the deadline for Defendant Özdelik Hotel Tourism and Trade Limited Company ("Özdilek") to respond to Jane Roe's ("Plaintiff") Complaint (the "Complaint") (in C.A. No. 18-1525-RGA) shall be June 3, 2019. By entering into this stipulation, Özdilek does not waive, and expressly reserves, all defenses pursuant to Federal Rule of Civil Procedure 12, including without limitation, defenses related to sufficiency of process, service of process, and jurisdiction.

If Özdilek files a Motion to Dismiss, Plaintiff's deadline to respond to Özdilek's motion shall be extended until July 8, 2019. Özdilek's deadline to file a reply in further support of its motion shall be extended until July 31, 2019.

May 7, 2019

RHOADES & MORROW

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Attorneys for Defendant Özdilek Hotel Tourism and Trade Limited Company

IT IS SO ORDERED this	day of _	, 2019.
		The Honorable Richard G. Andrews
		United States District Judge